

No. 21-800

In the Supreme Court of the United States

TONY K. MCDONALD, ET AL.,

Petitioners,

v.

SYLVIA BORUNDA FIRTH, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of the Liberty Justice Center contains 4,022 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2022

/s/ Daniel R. Suhr

Daniel R. Suhr

Counsel of Record

LIBERTY JUSTICE CENTER

141 W. Jackson Blvd.

Suite 1065

Chicago, Illinois 60604

(312) 637-2280

dsuhr@libertyjusticecenter.org